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Days Inns of America, Inc. 339 Jefferson Road Parsippany, New Jersey 07054

Phone (201) 428-9700 Fax (201) 428-6057

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JOHN RUSSELL President/ Chief Operating Officer

July 5, 1994

Mr. W. Caton, Acting Secretary Federal Communications Commission 1919 M Street, NW, Room 222 Washington, D.C. 20554

CC Docket No. 92-77

Dear Mr. Caton:

As President of Days Inns of America, Inc., I oppose the implementation of Billed Party Preference (BPP) by the FCC.

BPP would be a severe burden on the consumer. The costs would be passed on to the consumer through increased charges for their calls. The time to setup a call by verifying the calling card number against the BPP data base would create bottleneck waiting times that might exceed 90 seconds or even 120 seconds. This certainly is not in the best interest of the consumer!

Modern technology and innovation would evolve beyond the need for BPP before it could be completely implemented. BPP would inhibit competition and innovation by placing the control of the call processing and verification exclusively in the hands of the LECs. Delivery of new services would be slowed from lack of competition.

The consumer would be better served by the FCC continuing to enforce existing regulations such as unblocking and TOCSIA. Unblocking, branding and appropriate signage provide all the information a customer needs to reach the carrier of choice. Educational advertising done by the major carriers continues to inform the consumer as to how to get to the carrier of choice. Educational advertising done by the major carriers continues to inform the consumer as to how to get to the carrier of choice.

In summary, in its current form, BPP does not appear to provide sufficient consumer benefit to warrant its mandatory implementation. The FCC should reject this proposal recognizing that the incremental costs far outweigh the incremental consumer benefits. Instead, continue to expedite and enforce the unblocking of access codes and mandate clear and standardize signage.

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## MMI HOTEL GROUP



1817 Crane Ridge Drive Jackson, Mississippi 39216

P.O. Box 16807 Jackson, Mississippi 39236-6807

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July 26, 1994

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M. Street-Room 222 Washington, DC 20554

Re: CC Docket No. 92-77, Phase II

Dear Mr. Caton:

I operate 16 moderately priced hotels in the southeastern United States. We employ some 1500 employees, each of which are dependant on our making their hotel successful.

One essential area of service is that of proper telephone access. Our industry has worked diligently to provide the necessary services to our guests. However, this effort does not come without expense.

Today's consumer will not allow many telephone services to be billed directly. The competitive components of the marketplace demand that we include most telephone benefits in their room rate.

To be able to afford to provide these services and stay current with technology, we must be able to recuperate these expenses in some way. Today we have the opportunity to negotiate with our long distance carriers so as to provide methods by which to absorb some of these costs. Once again the free market prevails in making the outcome at each level of sale appropriate and reasonable.

I would appreciate your taking my opposition into consideration when the issue of "Billed Party Preference" is decided upon.

Thank you for your time.

Sincerely,

Gaines P. Sturdivant, CHA

President

GPS/sk

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Judith M. Lynch County Executive Department of Corrections

139 West 5th Street

Erie, Pennsylvania 16507

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July 25, 1994

FCC Secretary's Office 1919 M Street, NW Room 222 Washington, D.C. 20554

92-77

RE: Billed Party Preference for 0+ InterLATA Calls

To Whom It May Concern:

The Erie County Prison would like to express its concern regarding the proposed regulations known as "Billed Party Preference." Such legislation if enacted, would seriously inhibit the ability of prison authorities to effectively maintain control of the operation of our inmate phone system.

We are particularly concerned with the following issues:

- 1. Victim and witness harassment prevention due to loss of blocking capability.
- 2. Loss of any supervision, monitoring, etc. capability by facility personnel.
- 3. Cost factors, including a collect only system, increased budgetary costs due to loss of inmate phone system commissions, and increased costs to inmates' families.

For the above reasons, we adamantly oppose "Billed Party Preference and encourage the FCC to do the same. We would appreciate any assistance your office could provide to prevent this action.

Sincerely,

David R. Rodrigues

Deputy Warden of Operations

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## Claremont University Center

TELE COMMUNICATIONS



330 E. Eighth Street Claremont, California 91711-5912 909/621-8000

June 24, 1994

Office of the Secretary
Federal Communications Commission
Washington, DC 20554
Docket No. 92 77

This note is in response to the issue of Billed Party Preference (BPP). A decision to implement BPP will force The Claremont Colleges to raise rates to our students for 1+ service, and/or remove the 0+ option entirely (if this is an option). The possibility of losing the commission we currently receive for 0+ service will be enough to force some kind of change. We currently provide access to the other 2 major carriers. Callers now have the option of whom they want to use (i.e.., be billed by). We currently provide our students with their own calling card system on campus, and ALL toll calls require an access code as do MOST "800" calls.

If any of the options mentioned above are not available to us, our only alternatives will be to raise access charges or calling rates or define some other type of "surcharge" to balance what is lost due to BPP. This by default will nullify any gain expected from BPP by the end user. And because of our requirements for fraud protection and user identification for billing, any change in 0+ for us will require the use of MORE access codes not less as assumed.

Sincerely,

Danny Gmeiner,

Acting Director, Telecommunications

The Claremont Colleges

Claremont, CA

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Judith M. Lynch County Executive Department of Corrections
139 West 5th Street
Erie, Pennsylvania 16507

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Arthur C. Amann
Director of Corrections / Werden

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